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7

8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2010-85**

12 **GUIXUAN MOU**  
13 **aka GUI XUAN MOU**  
14 **1600 S. Baldwin Ave., Apt. 27**  
15 **Arcadia, CA 91007**

**A C C U S A T I O N**

16 **Registered Nurse License No. 723346**

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation  
21 solely in her official capacity as the Interim Executive Officer of the Board of Registered  
22 Nursing ("Board"), Department of Consumer Affairs.

23 2. On or about March 24, 2008, the Board issued Registered Nurse License  
24 No. 723346 to Guixuan Mou, aka Gui Xuan Mou ("Respondent"). The Registered Nurse  
25 License was in full force and effect at all times relevant to the charges brought herein and will  
26 expire on August 31, 2011, unless renewed.

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1 **PRAYER**


2 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
3 alleged, and that following the hearing, the Board issue a decision:

4 1. Revoking or suspending Registered Nurse License No. 723346, issued to  
5 Guixuan Mou, aka Gui Xuan Mou.

6 2. Ordering Guixuan Mou, aka Gui Xuan Mou, to pay the Board the  
7 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
8 Professions Code section 125.3.

9 3. Taking such other and further action as deemed necessary and proper.

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11 DATED: 8/18/2009

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14 LOUISE R. BAILEY, M.ED., RN  
15 Interim Executive Officer  
16 Board of Registered Nursing  
17 State of California  
18 Complainant

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DOJ Matter ID: LA2009603351  
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1 EDMUND G. BROWN JR.  
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*Attorneys for Complainant*

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8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Interim Suspension Order  
11 Against:

Case No. *2010 - 85*

12 **GUIXUAN MOU**  
13 **aka GUI XUAN MOU**  
14 **1600 S. Baldwin Ave., Apt. 28**  
**Arcadia, CA 91007**

**STIPULATED INTERIM  
SUSPENSION OF LICENSE**

15 **Registered Nurse License No. 723346**

16 **Respondent.**

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
19 proceeding that the following matters are true:

20 **PARTIES**

21 1. Heidi J. Goodman ("Complainant") is the Assistant Executive Officer of the Board of  
22 Registered Nursing. She brought this action solely in her official capacity and is represented in  
23 this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Alvaro  
24 Mejia, Deputy Attorney General.

25 2. Guixuan Mou, aka Gui Xuan Mou ("Respondent") is represented in this proceeding  
26 by attorney Joseph Vincent Camarata, Esq., whose address is 3303 Del Mar Avenue, Suite B,  
27 Rosemead, CA 91770.

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3. On or about March 24, 2008, the Board of Registered Nursing issued Registered Nurse License No. 723346 to Guixuan Mou. The license was in full force and effect at all times relevant to the charges brought forth in the Petition for Interim Suspension Order and will expire on August 31, 2011, unless renewed.

## JURISDICTION

4. The Petition for Interim Suspension Order against Guixuan Mou ("Petition") was filed before the Board, and is currently pending against Respondent.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in the Petition. Respondent has also carefully read, and understands the effects of this Stipulated Interim Suspension of License.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Petition; the right to be represented by counsel at her own expense; the right to present affidavits, documentary evidence and oral argument at the hearing; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## STIPULATION

IT IS HEREBY STIPULATED that Registered Nurse License Number 723346 issued to Guixuan Mou, aka Gui Xuan Mou, is temporarily suspended pending resolution of the administrative proceedings.

1. Respondent shall lose all rights and privileges as a registered nurse in California as of the date of this fully executed Stipulated Interim Suspension of License until the resolution of an Accusation to be filed before the Board against Respondent's license;

2. Respondent shall not be practice or attempt to practice any aspect of nursing in the State of California until the Board's decision following an administrative hearing becomes final;

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3. Respondent shall not advertise, by any means, or hold herself out as practicing or available to practice nursing.

4. Respondent shall, within 48 hours of executing this Stipulated Interim Suspension of License, deliver to the Board, or its agent, for safekeeping pending a final administrative order of the Board in this matter, all indicia of her licensure as a registered nurse, including, but not limited to, her wall certificate and wallet card issued by the Board.

5. The parties understand and agree that facsimile copies of this Stipulated Interim Suspension of License, including facsimile signatures thereto, shall have the same force and effect as the originals.

**IT IS SO STIPULATED**

I have carefully read the Stipulated Interim Suspension of License. I understand the stipulation and the effect it will have on my Registered Nursing License. I enter into this voluntarily, knowingly, and intelligently, and agree to be bound by the conditions in this agreement.

DATED: 08/11/09



GUIXUAN MOU  
Respondent

I have read and fully discussed with Respondent Guixuan Mou the terms and conditions and other matters contained in this Stipulated Interim Suspension of License. I approve its form and content.

DATED: 8/11/09

  
JOSEPH VINCENT CAMARATA, ESQ.  
Attorney for Respondent

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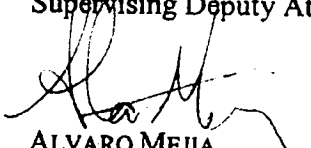
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1 IT IS SO STIPULATED

2 DATED: August 11, 2009

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4 EDMUND G. BROWN JR.  
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5 GREGORY J. SALUTE  
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11 DOJ Matter ID: LA2009603351  
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